

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SANG LAN,

Plaintiff,

- against -

Case No. 1:11-CV-2870  
(AT)(JCF)

**NOTICE OF MOTION**

AOL TIME WARNER, INC. et al.,

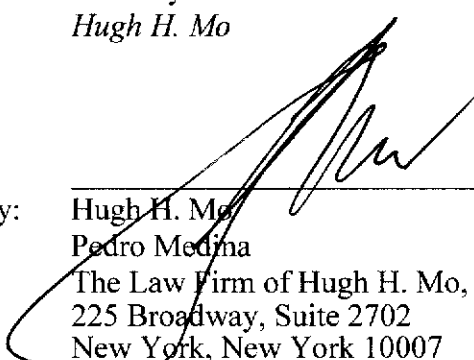
Defendants.  
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PLEASE TAKE NOTICE that upon the annexed Declaration of Hugh H. Mo, dated October 24, 2014, and the exhibits attached hereto, and the Memorandum of Law, dated October 24, 2014, submitted herewith, Defendants K.S. Liu, Gina Liu and Hugh H. Mo shall move the Court, before the Honorable James C. Francis, United States Magistrate Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order granting sanctions against plaintiff pursuant to Rules 37(b)(2)(A), (B) and (C) and 37(d)(1)(A)(i) of the Federal Rules of Civil Procedure:

- (1) striking Plaintiff Sang Lan's ("Plaintiff") Fourth Amended Complaint;
- (2) dismissing the Fourth Amended Complaint, with prejudice, for Plaintiff's disobedience of the Court's order dated October 10, 2014 (the "Oct. 10<sup>th</sup> Order") because of her failure to attend her own deposition;
- (3) granting Defendants' reasonable expenses, including attorney's fees, against both Plaintiff and her attorney X. Bing Xu, Esq., and The Bing Law Firm; and
- (4) for such other and further relief as the Court shall deem just and proper.

DATED: New York, New York  
October 24, 2014

THE LAW FIRM OF HUGH H. MO, P.C.  
Attorneys for Defendants *K.S. Liu, Gina Liu and  
Hugh H. Mo*

By:   
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